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*Attorneys for Defendant The Rainmaker  
Group Unlimited, Inc*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

RICHARD GIBSON, and HERIBERTO  
VALIENTE,

Plaintiffs,

v.

MGM RESORTS INTERNATIONAL,  
CENDYN GROUP, LLC, THE RAINMAKER  
GROUP UNLIMITED, INC., CAESARS  
ENTERTAINMENT INC., TREASURE  
ISLAND, LLC, WYNN RESORTS  
HOLDINGS, LLC,

Defendants.

Case No. 2:23-cv-00140-MMD-DJA

**DEFENDANT THE RAINMAKER  
GROUP UNLIMITED, INC.'S MOTION  
TO EXTEND TIME TO FILE VERIFIED  
PETITION**

**(FIRST REQUEST)**

1 Defendant THE RAINMAKER GROUP UNLIMITED, INC. (“*Defendant*”), by and  
2 through its counsel of record, hereby moves this Court to extend the time for Defendant’s  
3 counsel, Arman Oruc, Esq. (“*PHV Counsel*”), to file his Verified Petition, which is currently due  
4 March 22, 2023. PHV Counsel is requesting a 30-day extension. This is the first request for an  
5 extension of this deadline in this case.

6 This Motion is made and based upon the below Points and Authorities, the Declaration of  
7 Arman Oruc, Esq., all pleadings and papers on file herein, and such oral argument as may be  
8 heard by the Court.

9 Dated this 22nd day of March 2023.

10 **HOLLEY DRIGGS**

11 /s/ Nicholas J. Santoro

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*Attorneys for Defendant The Rainmaker Group  
Unlimited, Inc.*

28 **MEMORANDUM OF POINTS AND AUTHORITIES**

29 Defendant respectfully requests that the Court extend the time for PHV Counsel to file  
30 his Verified Petitions for 30 days from the current deadline of March 22, 2023 until April 21,

2023.

On January 25, 2023, Plaintiffs initiated this action. (ECF No. 1). On March 8, 2023, Defendant filed a Stipulation and [Proposed] Order to Extend Time for Defendant The Rainmaker Group Unlimited, Inc. to Respond to the Complaint and a Certificate of Interested Parties. (ECF Nos. 62, 68). Pursuant to LR IA 11-2(e), “[a]n attorney must comply with all provisions of this rule within 14 days of his or her first appearance.” After filing the stipulation, PHV Counsel worked diligently to obtain the requisite Certificates of Good Standing; however, he has not been able to obtain a certificate from the District of Columbia bar within the allotted time frame. If PHV Counsel is able to submit his applications by March 22, he will do so, but makes this extension request out of prudence. This is the first such request for an extension in this action and is not made for any purposes of delay.

Dated this 22nd day of March, 2023.

**HOLLEY DRIGGS**

/s/ Nicholas J. Santoro

Nicholas J. Santoro (NV Bar No. 532)

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*Attorneys for Defendant The Rainmaker Group  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 22nd day of March, 2023, a true and correct copy of  
**DEFENDANT THE RAINMAKER GROUP UNLIMITED, INC.'S MOTION TO  
EXTEND TIME TO FILE VERIFIED PETITION** was served electronically through with the  
Clerk of the Court using the CM/ECF system to the following counsel of record:

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**DECLARATION OF ARMAN ORUC, ESQ.**

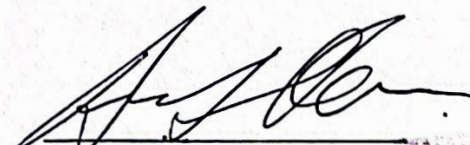
I, Arman Oruc, pursuant to 28 U.S.C. § 1746 and under penalty of perjury, hereby declare the following is true and correct to the best of my knowledge:

1. I am an attorney in the law firm of GOODWIN PROCTER LLP and counsel for Defendant THE RAINMAKER GROUP UNLIMITED, INC. ("*Defendant*") in the above-captioned matter. I make this Declaration in support of Defendant's Motion to Extend Time to File Verified Petition. I am competent to testify to the matters set forth herein, of which I have personal knowledge. If called as a witness to testify, I could and would truthfully testify to the matters set forth herein.

2. After filing the Stipulation and [Proposed] Order to Extend Time for Defendant The Rainmaker Group Unlimited, Inc. to Respond to the Complaint (ECF No. 62) and the Certificate of Interested Parties (ECF No. 68), my office worked diligently to obtain Certificates of Good Standing from the District of Columbia, California, and New York. I have now received certificates from California and New York, but have not been able to obtain a certificate from the District of Columbia as of the date of this declaration. I am concerned it may not arrive by the current March 22, 2023 deadline.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under federal law that the foregoing is true and correct.

Dated this 21st day of March, 2023.

  
ARMAN ORUC, ESQ.